



Order Filed on November 16, 2020  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

1  
2 UNITED STATES BANKRUPTCY COURT  
3 DISTRICT OF NEW JERSEY

4 Raymond & Raymond  
5 Attorneys at Law  
6 7 Glenwood Avenue, 4<sup>th</sup> Floor  
7 East Orange, New Jersey 07017  
8 Telephone: (973) 675-5622  
9 Telefax: (408) 519-6711  
10 Email: [herbertraymond@gmail.com](mailto:herbertraymond@gmail.com)  
11 Herbert B. Raymond, Esq.  
12 Jeffrey M. Raymond, Esq.  
13 Kevin DeLyon, Esq.  
14 Attorneys for the Debtor(s)

In Re:

10 NANA OPOKU-WARE, DEBTOR(S)

Case No.: 19-25519 JKS

Adv. No.:

11 Hearing Date: 11/12/20 @ 8:30 A.M.

12 Judge: JOHN K. SHERWOOD

13  
14  
15 CONSENT ORDER ADDRESSING  
16 MORTGAGE FORBEARANCE ARREARS  
17 AND POST-FORBEARANCE MORTGAGE ARREARS

18 The relief set forth on the following pages, two (2) through four (4) is  
19 hereby **ORDERED**.

20  
21  
22 **DATED: November 16,**  
23 **2020**

24  
25  
26  
27  
28   
Honorable John K. Sherwood  
United States Bankruptcy Court

1 Page 2

2 Debtor: Nana Opoku-Ware, Debtor

3 Case no.: 19-25519 JKS

4 Caption of order: Consent Order Addressing Forbearance and Post-  
Forbearance Mortgage Arrears

5

6 1. U.S. Bank, NA, as Trustee, serviced by Rushomore Loan  
7 Management ('Rushmore'), holds the first mortgage pertaining to  
8 real property owned by the Debtor located at 123-125 Division St.,  
9 Elizabeth, New Jersey 07201.

10 2. Rushmore filed a Notice of Mortgage Forbearance, because of  
11 Covid Pandemic related issues, pertaining to mortgage payments for,  
12 three mortgage payments, in the amount of \$2,085.52 per payment,  
13 for a total forbearance arrearage of \$6,256.56

14 3. In addition to the forbearance payments, the Debtor has  
15 missed three additional post-petition payments, in the amount of  
16 \$2,085.52 per payment, for a total additional post-petition, non-  
17 forbearance arrearage, of \$6,256.56.

18 4. Thus the total post-petition arrears, including forbearance  
19 and non-forbearance payments, amounts to \$12,513.12, covering the  
20 months of May of 2020 through October of 2020.

21 5. The parties have agreed that the post-petition arrearage is  
22 to be included and paid through the plan. This sum, \$12,513.12, is  
23 to be paid through the plan, in addition to the pre-petition  
24 arrearage as set forth in Rushmore's proof of claim. The Chapter  
25 13 Trustee shall adjust the records accordingly and schedule this  
26 sum for payment, in addition to the pre-petition arrears.

27

28

1 Page 3

2 Debtor: Nana Opoku-Ware, Debtor

3 Case no.: 19-25519 JKS

4 Caption of order: Consent Order Addressing Forbearance and Post-  
5 Forbearance Mortgage Arrears

6

---

7 6. The Debtor shall re-start making mortgage payment to  
8 Rushmore, November 1, 2020, to be paid by the Debtor, directly to  
9 Rushmore.

10 7. There shall be a thirty (30) day default clause, in favor  
11 of the lender/servicer, Rushmore, regarding ongoing mortgage  
12 payments.

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 Page 4

2 Debtor: Nana Opoku-Ware, Debtor

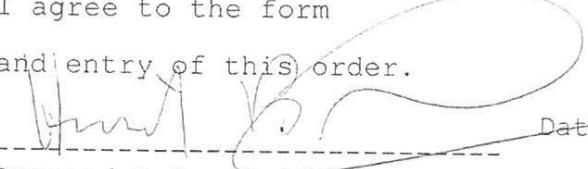
3 Case no.: 19-25519 JKS

4 Caption of order: Consent Order Addressing Forbearance and Post-  
5 Forbearance Mortgage Arrears

6

7 I agree to the form

8 and entry of this order.



9 Dated: November 9, 2020

10 Raymond & Raymond, Esqs.  
By: Herbert B. Raymond, Esq.  
11 Debtor's Counsel of Record

12   
13 /S/ DATED: November 9<sup>th</sup>, 2020  
14 Romano, Garubo & Argentieri, Esqs.  
By: Emmanuel J. Argentieri, Esq.  
15 Attorneys for Rushmore Loan Management

16

17

18

19

20

21

22

23

24

25

26

27

28

In re:  
Nana Opoku-Ware  
Debtor(s)

Case No. 19-25519-JKS  
Chapter 13

District/off: 0312-2  
Date Rcvd: Nov 17, 2020

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 1

The following symbols are used throughout this certificate:

**Symbol** **Definition**

+ Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 19, 2020:**

<b>Recip ID</b>	<b>Recipient Name and Address</b>
db	+ Nana Opoku-Ware, 123-125 Division Street, Elizabeth, NJ 07201-2844

TOTAL: 1

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Nov 19, 2020

Signature: /s/Joseph Speetjens

---

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 17, 2020 at the address(es) listed below:

<b>Name</b>	<b>Email Address</b>
Emmanuel J. Argentieri	on behalf of Creditor U.S. Bank NA as Legal Title Trustee for Truman 2016 SC Title Trust bk@rgalegal.com
Herbert B. Raymond	on behalf of Debtor Nana Opoku-Ware herbertraymond@gmail.com raymondmail@comcast.net;bankruptcyattorneys@comcast.net;herbertraymond@gmail.com;carbonell_c@hotmail.com;kdelyon.raymond@gmail.com;herbertraymond5967@yahoo.com;raymondlaw5622@gmail.com;courtemails789@gmail.com
Marie-Ann Greenberg	magecf@magrue.com
Melissa N. Licker	on behalf of Creditor Wilmington Savings Fund Society FSB, d/b/a Christiana Trust, not individually but as trustee for Hilldale Trust as serviced by Fay Servicing NJ_ECF_Notices@mccalla.com, mccallaecf@ecf.courtdrive.com
Phillip Andrew Raymond	on behalf of Creditor Fay Servicing LLC, as servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not

District/off: 0312-2

User: admin

Page 2 of 2

Date Rcvd: Nov 17, 2020

Form ID: pdf903

Total Noticed: 1

individually but as trustee for Hilldale Trust phillip.raymond@mccalla.com, mccallaecf@ecf.courtdrive.com

Rebecca Ann Solarz

on behalf of Creditor PNC Bank National Association rsolarz@kmllawgroup.com

Shauna M Deluca

on behalf of Creditor MTGLQ Investors LP sdeluca@rasflaw.com

Sindi Mncina

on behalf of Creditor MTGLQ INVESTORS LP smncina@rascrane.com

U.S. Trustee

USTPRRegion03.NE.EDCF@usdoj.gov

TOTAL: 9